

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,  
Plaintiff,

v.

\$49,400 IN UNITED STATES  
CURRENCY SEIZED  
AT LOGAN AIRPORT,  
Defendant.

Civil Action No.: 18-CV-12233

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

The United States of America, by its attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 21 U.S.C. § 881(a)(6) alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355.

Venue is appropriate pursuant to 28 U.S.C. § 1395.

2. The defendant property consists of the following:

- a. \$49,400 in United States currency, seized on May 1, 2018, from Robert Kenny, at Boston Logan International Airport (the "Defendant Currency").

3. As detailed in the Affidavit of David O'Neill, Special Agent with the United States Drug Enforcement Administration, attached hereto as Exhibit A and incorporated herein by reference, the United States has probable cause to believe that the Defendant Currency is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6), because it represents moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841 and/or 846, proceeds traceable to such an exchange, and/or moneys, negotiable instruments or securities used or intended to be used to facilitate such a violation.

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshal for the District of Massachusetts, or his designee, commanding him to seize the Defendant Currency, and give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against the Defendant Currency;
3. That thereafter, the Defendant Currency be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,


ANDREW E. LELLING  
United States Attorney

By: /s/ Carol E. Head  
CAROL E. HEAD, B.B.O. # 652170  
Assistant United States Attorney  
U.S. Attorney's Office  
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Boston, MA 02210  
(617) 748-3100  
carol.head@usdoj.gov

Dated: October 25, 2018

Verification

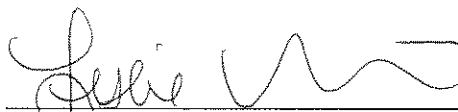
I, David X. O'Neill, Special Agent for the United States Drug Enforcement Administration state that I have read the foregoing Verified Complaint for Forfeiture *in Rem*, and the Affidavit, attached as Exhibit A, and that the contents thereof are true to the best of my knowledge, information, and belief.



David X. O'Neill  
Special Agent  
Drug Enforcement Administration

Dated: October 25<sup>th</sup> 2018

On this 25<sup>th</sup> day of October, 2018, before me, David X. O'Neill, Special Agent with the United States Drug Enforcement Administration, proved to me through valid drivers license, to be the person whose name is signed on the preceding or attached document, and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.



Notary Public

My commission expires: 10/8/21



LESLIE A. MCCARTHY  
Notary Public  
Commonwealth of Massachusetts  
My Commission Expires  
October 8, 2021